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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

M.S., a minor individual, by Guardian  
 VALERIE SANDERS,

Plaintiff,

vs.

HYUNDAI MOTOR AMERICA, a  
 California business entity; HYUNDAI  
 MOTOR COMPANY, a Korean corporation;  
 TAKATA CORPORATION, a Japanese  
 corporation; ZF TRW AUTOMOTIVE  
 HOLDINGS CORP., a Delaware  
 Corporation; ZF FRIEDRICHSHAFEN AG,  
 a German Corporation; ROE AIRBAG  
 MANUFACTURING COMPANY; DOE  
 INDIVIDUALS I through XXX and ROE  
 CORPORATIONS XXXI through LX,

Defendants.

Case No.: 2:20-cv-01861-GMN-BNW

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE TO RESPOND TO  
 DEFENDANT ZF TRW AUTOMOTIVE  
 HOLDINGS CORP.'S MOTION TO  
 DISMISS FOR LACK OF PERSONAL  
 JURISDICTION AND FAILURE TO  
 STATE A CLAIM (ECF NO. 17)**

**[FIRST REQUEST]**

1 Plaintiff M.S., a minor individual, by Guardian VALERIE SANDERS ("Plaintiff"), by  
 2 and through their counsel KEMP JONES LLP and Defendants ZF TRW AUTOMOTIVE  
 3 HOLDINGS CORP. ("ZFAH"), by and through its counsel of record, WEINSTEIN TIPPETTS  
 4 & LITTLE LLP and OLSON, CANNON, GORMLEY & STOBERSKI, hereby stipulate and  
 5 agree as follows:

6 1. Plaintiff shall have an extension of time to November 3, 2020, to respond to ZFAH's  
 7 Motion to Dismiss for Lack of Personal Jurisdiction and Failure to State a Claim (ECF No. 17)  
 8 ("Motion to Dismiss").

9 2. This extension is requested to provide Plaintiff with sufficient time to review and  
 10 succinctly respond to the points and authorities made in ZFAH's Motion to Dismiss which has  
 11 been further impacted by a recent unexpected medical issue which prevented Plaintiff's counsel,  
 12 Randall Jones, Esq., from working in any capacity.

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1 3. The stipulated extension to the briefing schedule will not prejudice the parties, nor will it  
2 impact any other Court-imposed deadlines established in this case. This is the first request for a  
3 continuance of these briefing deadline

4 DATED this 27<sup>th</sup> day of October, 2020.

6 KEMP JONES, LLP

WEINSTEIN TIPPETTS & LITTLE LLP

8 By: 

By: 

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*Attorneys for Defendant ZF TRW  
Automotive Holdings Corp.*

21 **IT IS SO ORDERED.**

22 Dated this 27 day of October, 2020.

23   
24 Gloria M. Navarro, District Judge  
25 United States District Court  
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